

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JERRY DIDONATO, ED KOGELIS, and)	
LEOVIGILDO LOERA individually, and on behalf of)	
those similarly situated,)	
)	
Plaintiffs,)	
)	Case No. 19-cv-2694
v.)	
)	
NATIONAL PRODUCTION WORKERS UNION)	
SEVERANCE TRUST PLAN <i>et al.</i>)	Judge John Robert Blakey
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Jerry Didonato, Ed Koegelis, and Leovigildo Loera ("Plaintiffs") respectfully move this Court to (1) preliminarily approve the parties' Class Action Settlement Agreement in this matter; (2) approve the proposed Settlement Notice and authorize distribution of the Notice to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes; (4) schedule a final approval hearing; and (5) enter the accompanying proposed Preliminary Approval Order, agreed to by all parties.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is supported by the accompanying memorandum of law. Defendants do not oppose the relief requested in this motion, as reflected in Paragraph 2 of the Settlement Agreement, attached as Exhibit A to the Declaration of Elizabeth L. Rowe accompanying the memorandum of law.

WHEREFORE, for the reasons set forth in the accompanying memorandum of law and attachments thereto, Plaintiffs request that the Court grant this motion and enter the proposed agreed Preliminary Approval Order submitted to the Court with this motion.

Respectfully submitted,

/s/ Elizabeth L. Rowe
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